

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES DEPARTMENT
OF AGRICULTURE,

PLAINTIFF

v.

NICHOLE SCHOOLER a/k/a NICOLE
SCHOOLER,

DEFENDANT

MIDLAND FUNDING LLC,
STATE FARM BANK,
INHABITANTS OF THE
TOWN OF FAIRFIELD MAINE, and
KENNEBEC WATER DISTRICT,

PARTIES-IN-INTEREST

CIVIL ACTION NO.:

1:25-cv-00279-SDN

**APPLICATION FOR ENTRY OF DEFAULT AGAINST DEFENDANT NICHOLE
SCHOOLER, a/k/a NICOLE SCHOOLER PURSUANT TO RULE 55(a) OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

To the Clerk of the United States District Court for the District of Maine:

Plaintiff, the United States Department of Agriculture hereby requests pursuant to Rule 55(a) of the Federal Rules of Civil Procedure that the Clerk enter the default of the following Defendant, Nichole Schooler, a/k/a Nicole Schooler, for failure to plead or otherwise defend against this action in a timely manner.

Defendant Nichole Schooler, a/k/a Nicole Schooler:

(1) As shown by the proof of service previously filed with this Court, the above-named Defendant was served pursuant to Rule 4 of the Federal Rules of Civil Procedure on July 29, 2025.

(2) The applicable time limit for the above-named Defendant to appear or otherwise respond to this action under Rule 12 of the Federal Rules of Civil Procedure expired on August 19, 2025.

The above-named Defendant has failed to plead or otherwise respond to the Complaint.

This request is based on the attached Declaration of Attorney for Plaintiff, Kevin J. Crosman, Esq.

Dated September 22, 2025.

/s/ Kevin J. Crosman
Kevin J. Crosman, Bar No. 4279
Attorney for Plaintiff

JENSEN BAIRD
Ten Free Street
PO Box 4510
Portland, Maine 04112-4510
(207) 775-7271
kcrosman@jensenbaird.com

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2025, I caused a copy of the foregoing to be served by way of the ECF system, which will send notice of such filing to all counsel of record.

The following parties were notified by First Class Mail, Postage Pre-Paid:

Nichole Schooler
51 Oliver Hill Road
Garland, ME 04939

Inhabitants of the Town of Fairfield, Maine
19 Lawrence Ave
Fairfield, ME 04937

Kennebec Water District
131 Drummond Ave
Waterville, ME 04901

Midland Funding LLC
c/o Corporation Service Company
45 Memorial Circle
Augusta, ME 04330

State Farm Bank
c/o Corporation Service Company
45 Memorial Circle
Augusta, ME 04330

Dated at Portland, Maine, this September 22, 2025.

/s/ Kevin J. Crosman

Kevin J. Crosman, Bar No. 4279
Attorney for Plaintiff